

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application)

of)

SANDWICH ISLES)
COMMUNICATIONS, INC.)

DOCKET NO. 2010-0304

For: Annual Certification as Eligible)
Telecommunications Carriers (ETC))

SANDWICH ISLES COMMUNICATIONS, INC.'S **RESPONSE** TO
CONSUMER ADVOCATE'S FIRST SUBMISSION OF
INFORMATION REQUESTS DATED JANUARY 7, 2011

CERTIFICATE OF SERVICE

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PUBLIC UTILITIES
COMMISSION

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application	)	
of	)	
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SANDWICH ISLES COMMUNICATIONS, INC.'S **RESPONSE** TO
CONSUMER ADVOCATE'S FIRST SUBMISSION OF
INFORMATION REQUESTS DATED JANUARY 7, 2011

Sandwich Isles Communication, Inc. (hereinafter the "Company" or "SIC") hereby submits its response to the Consumer Advocate's First Submission of Information Requests dated January 7, 2011.

The Company reserves the right to further supplement any and all of its responses set forth herein, should it be necessary.

DOCKET NO. 2010-0304

**SANDWICH ISLES COMMUNICATIONS, INC.'S RESPONSE TO
FIRST SUBMISSION OF INFORMATION REQUESTS**

CA-IR-1 - Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Application. Page 2 — Service Area.

Sandwich Isles Communications, Inc. ("SIC") contends on page 2 of its application that ". . . SIC's service area is rural and predominantly on the neighbor islands.

- a. Please provide a listing of all of SIC's wire centers on all islands, and identify each wire center's IAS Access Zone Code per the www.usac.org website or whether the wire center is a rural or non-rural / urban site.

SIC Response: [REDACTED]

[REDACTED]:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- b. Please discuss and describe how SIC determines or defines whether a wire center is classified as rural versus non-rural / urban. Assuming that such determination is based on statutory or regulatory guidelines, please provide the appropriate citation(s) supporting the Company's classification.

SIC Response: As set forth in its application, SIC is by definition a “Rural Local Exchange Carrier” (RLEC), in accordance with section 153(37)(B) of the Communications Act of 1934, as amended (47 U.S.C. § 153(37)(B)), which provides:

The term “rural telephone company” means a local exchange carrier operating entity to the extent that such entity: . . .

(B) provides telephone exchange service, including exchange access, to fewer than 50,000 access lines.

SIC has an exclusive statewide license to serve residents on the HHL, which consists of approximately 70 non-contiguous, remote land parcels on six of the Hawaiian Islands. SIC is eligible and receives federal universal service support through financial cost recoveries disbursed from the federal Universal Service Fund (USF) for SIC’s provision of telecommunications services to rural, insular and high cost areas, of which HHLs are a part of, at rates that are reasonably comparable to those charged in urban areas.

CA-IR-2 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Application, Page 2 and 3 — Access to Telecommunications and Information Services

The Company notes that the federal policy of "Universal Service" is to provide the opportunity for every American, including those in high-cost, rural and insular areas, to have access to telecommunications and information services reasonably comparable to those services provided in urban areas ("comparable telecommunications and information services") at rates comparable to those charged for similar services in urban areas ("comparable rates").

- a. Please identify which of SIC's wire center customers do not presently have access to comparable telecommunications and information services and rates that are described above. (Include wireline and wireless services.) Please provide copies of the support relied upon to make this determination.

SIC Response SIC customers have comparable telecommunications and information services at comparable rates as shown in work papers 1 to SIC's response to CA-IR-2 attached hereto..

- b. If applicable, please discuss why SIC believes their identified wire center customers do not presently have access to the above described "comparable telecommunications and information services." In its response, the Company should identify the specific comparable telecommunications or information services (with appropriate citations to other carriers and the relevant services) SIC believes their wire center customers do not have access to.

SIC Response: Not applicable.

- c. If applicable, please discuss why SIC believes their identified wire center customers do not presently have access to the above services describe at "comparable rates." Identify in discussion the specific comparable services and the associated rates SIC believes their wire center customers do not have access to.

SIC Response: Not applicable.

- d. If SIC believes that all of its wire center customers already have access to comparable telecommunications and information services and rates that are described above, please discuss why SIC believes it should continue to receive USF support.

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CA-IR-3 - Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Application -USF Support.

- a. Based on the service maps for the various wireline and wireless carriers, it would appear that all of the state inhabitable HHL areas have at least one provider if not multiple carriers that can provide service to all areas. If this understanding is incorrect, please identify the HHL area(s), if any, which represent un-served areas from the customers' perspectives. In addition, separately identify those HHL areas un-served by the SIC.

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- b. If there are no HHL inhabitable areas in the state that are not already served by the Company or by another carrier, please explain the need for additional USE support for SIC.

1. If it is the Company's contention that service can be improved, please provide the following:

- (a) identify the current service shortcomings and provide historical reports for the last three years

that are tracking these current service measures; and

- (b) The planned projects to address the shortcomings and an explanation of how these projects will address the situation.

SIC Response:

[REDACTED]

2. If it is the Company's contention that new services can be offered, please provide the following:
- (a) Identify the new service offerings; and
- (b) Identify the pricing for the new service offerings, both at the retail and, if applicable, the subsidized pricing that would be available to rural, high-cost, and/or underserved HHL customers.

SIC Response: Not applicable.

3. If it is the Company's contention that existing services can be offered but at lower prices, please provide the planned tariff changes to allow rural, high-cost and/or underserved HHL customers to receive their current

services for less.

SIC Response: Not applicable.

CA-IR-4 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Application, Pages 4 to 6 — Confidential Material.

In its application, [REDACTED]

[REDACTED] It is difficult, however, to
determine exactly for what this support was or is intended to be used.

- a. Please provide a reconciled report that shows the amount of USF support received for 2009 and identify the specific purposes for which the funds were used. Please provide copies of any relevant accounting or compliance reports that support the Company's response,

SIC Response: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- b. Please provide a reconciled report that shows the amount of support projected to be received in 2010 and the specific purposes for which the funds were used.

SIC Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CA-IR-5 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Application, Pages 4 to 6.

In its Service Quality Improvement Plan for 2010 —2011, SIC lists what appear to be the various project descriptions for each year.

a.

[REDACTED]
[REDACTED]
[REDACTED]

please provide the complete timeline (i.e., when started, when to be completed), reasons why carried over each year, and how much USF support was used in each year.

SIC Response: Projects/timelines:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. Please provide a more detailed description of the [REDACTED]

[REDACTED], and the USF

support used for each such project.

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- c. Please confirm whether the [REDACTED]
- [REDACTED]
- [REDACTED]

SIC Response: [REDACTED]

[REDACTED]

- d. Please identify and describe all projects that were part of
SIC's plans for use of USF support, but not reflected on the
application, and discuss why these projects were not initiated.

SIC Response: Not applicable.

CA-IR-6 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: SIC Service Area — Un-served and Underserved.

- a. Please identify all inhabitable un-served high-cost rural SIC service areas that still require the provision of USF supported telecommunication services.

SIC Response: [REDACTED]
[REDACTED]
[REDACTED]

- b. Please identify SIC's plans to complete provision of USF supported services to these inhabitable un-served high-cost rural areas, and discuss SIC's timeline for completion.

SIC Response: Not applicable.

- c. Please identify all inhabitable underserved high-cost rural SIC service areas that still require the provision of more USF supported telecommunication services.

SIC Response: Not applicable.

- d. Please identify SIC's plans to complete provision of the remaining USF supported services to these inhabitable underserved high-cost rural areas, and discuss SIC's timeline for completion.

SIC Response: Not applicable.

CA-IR-7 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: SIC Provision of FTTH.

- a. Please discuss whether SIC's reasoning for provisioning of [REDACTED]

[REDACTED]

[REDACTED]

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- b. Please confirm whether SIC is using USF support [REDACTED]

[REDACTED]

SIC Response: [REDACTED]

[REDACTED]

- c. Please discuss whether USF support can currently be used for
provision of [REDACTED]

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- b. Please discuss what time planning horizons SIC uses in determining the size or capacity of the facilities it is or will be installing.

SIC Response: [REDACTED]

- c. Please discuss whether SIC considers the fill of existing facilities when determining the size or capacity of its facilities to be installed or added.

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

- d. Please discuss whether SIC considers other carriers who may already or will be providing services in the area in order to evaluate and determine the size or capacity of its facilities. If the response is yes, please include a discussion of how such evaluation and determination is conducted.

SIC Response: [REDACTED].

Microwave Radio Point to Point	System Type	System Equipped	System Provisioned

- SIC Response:**

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

- c. Please provide how many months or years capacity exists in the remaining capacities on SIC's major facilities by wire center.

SIC Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- d. Please discuss whether SIC is experiencing a net decrease in customer inward movement similar to many landline telecommunications companies across the nation

SIC Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidential Information
Deleted Pursuant to
Protective Order, Filed on
November 22, 2010

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CA-IR-10 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Application, Page 6 - SIC Replaces Existing Radio System.

It is sound economic reasoning to avoid expenditures for replacement of facilities that do not necessarily require replacement. Such a concern would also aid in ensuring efficient use of USF support received.

- a. Please discuss and describe how SIC determines whether an existing microwave radio system needs to be replaced.

SIC Response: [REDACTED]

[REDACTED]

- b. Please provide the studies or analyses and related results [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidential Information
Deleted Pursuant to
Protective Order, Filed on
November 22, 2010

A large rectangular black redaction box covers the majority of the upper half of the page, obscuring all content beneath the header.

CA-IR-11 Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Application, Page 6 – [REDACTED]

- a. Please provide a copy of all material or studies used by SIC and the Rural Utilities Service to determine [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- b. Please discuss and identify all alternatives to provision of a [REDACTED]
[REDACTED] that were reviewed, and why the resultant alternative was selected.

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

- c. Please discuss [REDACTED]

[REDACTED]

SIC Response: [REDACTED]

[REDACTED]

- d. Please discuss and identify the projected time horizon for [REDACTED]

[REDACTED]

SIC Response:

e. Please discuss and identify all

, and

CA-IR-12 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Competitive Bids for USF Related Projects.

The Consumer Advocate believes that utilizing competitive bidding where possible aids in ensuring the efficient use of USF support received.

- a. Please identify all USF related projects in 2009 and 2010 where SIC utilized competitive bidding.

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- b. Please identify the specific companies or entities that submitted bids for each USF related project where SIC used competitive bidding in 2009 and 2010.

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]



- c. Please note which of the companies or entities or any officer of said companies selected for contract award in b. above was/were an affiliate of SIC or related to an officer of SIC.

SIC Response: None of the companies or entities or any officer of said companies selected for contract award in CA-IR-12 (b) above was/were an affiliate of SIC or related to an officer of SIC.

- d. Please identify all USF related projects in 2009 and 2010 where SIC did not utilize competitive bidding, and explain why not.

SIC Response: There were no USF related projects in 2009 and 2010 where SIC did not utilize competitive bidding.

- e. Please identify which companies SIC awarded contracts to for USF related projects in 2009 and 2010 that did not use competitive bidding, where the awarded company was in some way an affiliate of or any officer of said company related to an officer of SIC.

SIC Response: Not applicable.

CA-IR-13 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ret: SIC Service Measurements Report.

On page 2 of its application, SIC represents that “. . . SIC takes very seriously its responsibility of providing quality and affordable telephone services . . .

- a. To validate the quality of service SIC provides to its customers, please provide the following service measurements for each month of 2009 and to date for 2010:

1. Total Customer Trouble Reports per 100 lines
2. % Dial Tone Speed Within 3 Seconds
3. % Completions: Dial Service Results
4. % Out of Service Troubles Cleared in 24 Hours
5. % of Operator Toll Calls Answered Within 10 Seconds
6. % of Operator Directory Assistance (DA) Calls
Answered Within 10 Seconds
7. % Repair Calls Answered Within 20 Seconds
8. % Repair Commitments Met
9. % Installations Completed Within 3 Days
10. % Business Combined Installation / Billing Office
Calls Answered in 20 Seconds
11. % Residence Combined Installation / Billing Office
Calls Answered in 20 seconds
12. % Installation Commitments Met

... **SIC Response:** SIC does take seriously its responsibility of providing quality and affordable telephone services and believes that it has and continues to do so. As stated in its Application, during the year 2009, to the best of our knowledge, no formal complaints were lodged with the PUC, the FCC, or the Attorney General regarding SIC service quality, consumer protection rules violations, or other matters. We believe the same representation will be made for the 2010 filing.

[REDACTED]

[REDACTED]

[REDACTED]

- b. The incumbent local exchange carrier ("ILEC") for the State of Hawaii namely Hawaiian Telcom, Inc. provides to the Commission a monthly Service Measurement Report which includes the above measurements. Since SIC contends on page 2 of its application that it is the rural local exchange carrier for the State of Hawaii and is serious about providing quality service, please discuss whether SIC would be agreeable to providing monthly reports on the above measurements to the Commission and Consumer Advocate on a going forward basis with similar objectives set by the Commission for the ILEC.

SIC Response: SIC would be agreeable to provide to the PUC and the Consumer Advocate any service management reports which it is required to file with either DHHL or the FCC. [REDACTED]

[REDACTED]

[REDACTED]

CA-IR-14 – Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Application. Page 7 - Economic Development.

SIC indicates on page 7 of its application that “[i]ts state-of-the-art network will encourage commercial development on HHL, particularly on the ‘neighbor’ islands. It is anticipated that a robust communications platform will encourage jobs creation, so neighbor island communities will be sustainable in these more rural parts of the state.”

- a. Please discuss whether HHL has provided SIC with any firm forecasts or plans for commercial development on HHL that would require and use SIC’s high-cost state-of-the-art network, particularly on the neighbor islands. If affirmative, please provide copies of HHL material that supports such forecasts or plans for commercial development.

SIC Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Such information is contained on DHHL's website, <http://hawaii.gov/dhhl>. [REDACTED]

[REDACTED]

[REDACTED]

- b. Please discuss the basis for SIC's belief that its high-cost state-of-the-art network will encourage commercial development on HHL, particularly on the neighbor islands. Include examples of how this has occurred in the past where a state-of-the-art network was the major impetus that encouraged commercial development on HHL, particularly on the neighbor islands.

SIC Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- c. If HHL has not provided SIC with any forecast or plans for any commercial development, please discuss why SIC is provisioning such a high-cost commercially driven state-of-the-art network ahead of any firm economic development forecasts.

SIC Response: Not applicable; [REDACTED]

[REDACTED]

- d. Please discuss what SIC will do with any excess capacity in its state-of-the-art network if its 20,000 HHL residents and commercial development forecasts do not materialize in its planning horizons.

SIC Response: See response to CA-IR-11(e).

CA-IR-15 -- Sponsor: Albert Hee/GVNW Consulting, Inc.

Ref: Non - USF Related Use of Facilities Provisioned with USFSupport.

- a. Please confirm whether SIC uses facilities provisioned using USF support for non-USF related services or services provided to customers other than HHL customers.

SIC Response: [REDACTED]
[REDACTED]

- b. If affirmative, please identify each specific facility, what percent of the facility is being or planned to be used for non-USE related services, and discuss how SIC justifies such non-USE related use of facilities provisioned by USF support.

SIC Response: Not applicable.

- c. If SIC cannot reasonably justify such non-USE related use of facilities provisioned by USE support, please discuss how SIC will rectify the situation including any proposed restitution to the USF

SIC Response: Not applicable

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on _____, a copy of the foregoing documents was duly served upon the following party via hand-delivery:

JON S. ITOMURA, ESQ.

LANE H. TSUCHIYAMA, ESQ.

Division of Consumer Advocacy

335 Merchant Street, Room 326

Honolulu, HI 96813

DATED: Honolulu, Hawaii, _____.



CLIFFORD K. HIGA

BRUCE NAKAMURA

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April 14, 2011

The Honorable Public Utilities Commission
of the State of Hawaii
Kekuanao'a Building, First Floor
465 South King Street
Honolulu, Hawaii 96813

FILED
2011 APR 15 A 7:53
PUBLIC UTILITIES
COMMISSION

Re: In the Matter of the Application of Sandwich Isles
Communications, Inc. for Annual Certification as Eligible
Telecommunications Carriers (ETC), Docket No. 2010-
0304

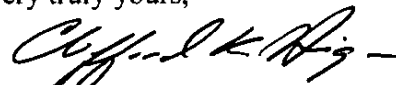
To the Honorable Public Utilities Commission of the State of Hawaii:

Enclosed with this letter, for the Public Utilities Commission of the State of Hawaii's (the "Commission") review, please find Sandwich Isles Communications, Inc.'s Response to the Consumer Advocate's First Submission of Information Requests Dated January 7, 2011 including the redacted portions containing confidential information ("Confidential Material").

In addition, we enclose a chart showing the portions of the Information Requests that were redacted as well as the explanation of such redactions as Attachment "A" hereto.

If you should have any questions, please do not hesitate to contact the undersigned.

Very truly yours,



CLIFFORD K. HIGA
BRUCE A. NAKAMURA
ANTHONY E. SUETSUGU
for
KOBAYASHI, SUGITA & GODA

477420

cc: Division of Consumer Advocacy w/enclosure
Enclosure: Exhibit "A"

ATTACHMENT "A"

(Sandwich Isles Communications, Inc. Docket No. 2010-0304)

Pursuant to the protective Order approved by the Public Utilities Commission of the State of Hawaii ("Commission") on November 22, 2010, ("Protective Order") Sandwich Isles Communications, Inc. ("SIC") is authorized to designate certain materials as confidential if such materials are believed, in good faith to contain trade secrets or other confidential research, development, commercial financial, vendor, or bid information, including but not limited to cost support studies ("Confidential Information"). Such Confidential Information is protected against disclosure to non-qualified persons as defined in the terms of the Protective Order, unless such information is declassified, or permission to disclose the Confidential Information is granted by Hawaiian Electric as provided in terms of the Protective Order.

Pursuant to the Protective Order, SIC designates the following materials submitted to the Commission as containing Confidential Information.

1. SIC believes in good faith that the redacted portions of its response to the IR is Confidential Information pursuant to the Protective Order as it contains information that is confidential, commercial, business sensitive, trade secrets, privileged and proprietary information which, if disclosed could result in others using such information to the competitive disadvantage of SIC and SIC's customers. The Confidential information redacted from CA -IRs 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14 and 15 is information that is not ordinarily available and which SIC would not disclose to its supplier's competitors, customers, or the general public.

For all of the Confidential Information, the location of the Information is Sandwich Isles's address of record. The nature of the information is confidential, commercial, business sensitive, trade secrets, and proprietary information which, if disclosed could result in others using such information to the competitive disadvantage of SIC and SIC's customers. Sandwich Isles considers the Confidential Information designated herein, in good faith, to be Confidential Information as set forth in the Protective Order.

April 14, 2010